



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

December 01, 2016

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MS. NICOLE O'LOUGHLIN
PYXIS REGULATORY CONSULTING, INC., AGENT FOR
GENERATEC, LLC
4110 136TH STREET CT NWF
GIG HARBOR, WA 98332-9122

Dear Ms. Cochran:

Subject: Transfer of Pesticide Registrations and Data From Company Number **91127**
to Company Number **91139**

Pursuant to your request in your letter and transfer agreement of October 07, 2016
and subsequently received information, we have approved the transfer of the following
registrations from **EXTREMIS, LLC**, company number **91127** to **GENERATEC, LLC**,
company number **91139**.

The effective date of these changes is the date of this letter.

| <u>Registered Products</u> | <u>Old EPA Reg. No.</u> | <u>New EPA Reg. No.</u> |
|-----------------------------|-----------------------------|-----------------------------|
| EXT ACETAMIPRID TGAI | 91127-2 | 91139-2 |

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number. If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to

enter into supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

With regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The annual maintenance fee is based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

The Agency acknowledges it has received a request for data transfer dated October 07, 2016, to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date **GENERATEC, LLC** will be considered the data owner. This action will not automatically reflect on the Data Submitters List. If you wish to be added to the Data Submitters List, you must submit a request to:

By Courier (FedEx, UPS, DHL etc.)
Document Processing Desk (DSL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
2777 Crystal Drive, Room S4900
Arlington, VA 22202

Or, you may fax to our secure **FAX** at **(703) 305-7670**.

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact Louis Vaughn at (703) 308-8114.

Sincerely,



Steve Robbins, Chief
Information Services Branch
Information Technology & Resource Management Div. (7504P)

cc: MS. JANELLE KAY
PYXIS REGULATORY CONSULTING, INC., AGENT FOR
EXTREMIS, LLC
4110 136TH ST. CT. NW
GIG HARBOR, WA 98332

RE: L_91127_RAD_91139_12_01_2016

APPENDIX A

| MIRID or other Identifying Administrative Number | Name of the Study | Name of Person or Lab that Conducted the Study | Date the Study was Submitted to EPA | Is Exclusive Use Claimed? (Y or N) | If Yes then, Date Period of Exclusive Use Ends |
|--|--|--|-------------------------------------|------------------------------------|--|
| 49590801 | Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits and Enforcement Analytical Method for Argite Acetamiprid Technical | A. M. Tillman | 3/17/2015 | N | |
| 49590802 | Five Batch Analysis of Acetamiprid TGA1 – Validation of Analytical Methodology for the Assay of Active Ingredient and Subsequent 5-Batch Analysis of the Test Item | Achiever Biochem Co., Ltd. | 3/17/2015 | N | |
| 49590803 | Physical and Chemical Characteristics of Acetamiprid TGA1: Color, Physical State, Odor, Stability, Oxidation/Reduction, pH, UV/Visible Absorption, Melting Point and Density | Achiever Biochem Co., Ltd. | 3/17/2015 | N | |
| 49590804 | Argite Acetamiprid Technical: Physical and Chemical Properties and Waiver Request | A. M. Tillman | 3/17/2015 | N | |